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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JACI FERRERYA,

11 Plaintiffs,

12 v.

13 TARGET CORPORATION, DOES 1 through 10, ;
14 and ROE ENTITIES 11-20, inclusive,

15 Defendants.

CASE NO: 2:10-cv-01870-KJD-LRL

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

SUBMITTED IN COMPLIANCE WITH
LOCAL RULE 26-1(e)

17 The above named parties, by and through their respective counsel of record, hereby submit
18 the Stipulated Discovery Plan and Scheduling Order pursuant to FRCP 26(f) and Local Rule 26-1(e)
19 for the Court's approval. This plan is submitted in compliance with the timing rules set forth in
20 LR26-1(e), measured from the date of the 26(f) conference, November 15, 2010.
21

22 **DISCOVERY PLAN**

23 1. The Plaintiff requested an additional fourteen (14) days from the date of the Rule
24 26(f) Conference in which to make her initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1).
25 Defendant's initial disclosure of documents and witnesses was made on November 15, 2010.
26 Plaintiff's initial disclosure of documents and witnesses shall be served no later than November 29,
27 2010.
28

4. The parties do not request any other orders under the FRCP 26(c), FRCP 16(b) or FRCP 16(c).

1. **Discovery Cut-Off Date:** Defendants filed their answer to Plaintiff's Complaint on May 11, 2010. As stipulated between the parties, discovery will commence once the Discovery Plan has been submitted to the court. All discovery must be completed not later than **April 25, 2011**.

3. **Disclosure of Expert Witnesses:** In accordance with FRCP 26(a)(2), disclosures identifying expert witnesses shall be made sixty (60) days prior to the discovery cut-off date and not later than **February 24, 2011**, and disclosures respecting rebuttal experts shall be made thirty (30) days after the disclosure of experts and not later than **March 28, 2011**.

5. **Dispositive Motions:** The filing of Dispositive Motions shall not be later than thirty (30) days after the discovery cut-off date and not later than **May 25, 2011**.

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1 after the date set for filing Dispositive Motions and not later than June 24, 2011. In the event
2 Dispositive Motions are filed, the date for filing the Joint Pretrial Order shall be suspended until
3 thirty (30) days after the decision of the Dispositive Motions or further order of the court.

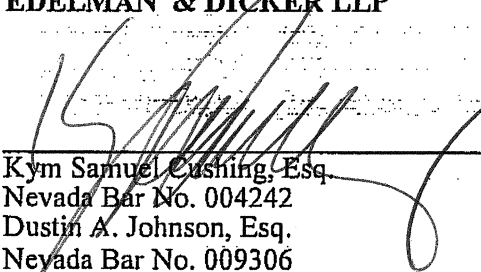
4 **7. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

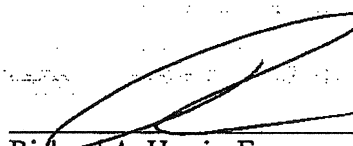
5 In accordance with LR 26-4, any stipulations or motion for modification or extension of this
6 discovery plan and scheduling order must be made no later than twenty (20) days before the
7 discovery cut-off date, or no later than April 5, 2011.

8
9 DATED this 15th day of December, 2010. DATED this 8th day of December, 2010.

10 **WILSON, ELSER, MOSKOWITZ,**
11 **EDELMAN & DICKER LLP**

RICHARD HARRIS LAW FIRM

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19 IT IS SO ORDERED.

20 Dated this 16th day of December, 2010.

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22 
23
24 **UNITED STATES MAGISTRATE JUDGE**